

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

OSURE BROWN, on his own behalf and  
on behalf of other similarly situated  
persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00669-RSL

STIPULATION AND ORDER TO EXTEND  
INITIAL DISCOVERY DEADLINES

NOTE ON MOTION CALENDAR:

September 8, 2020

**STIPULATION**

The Parties mutually agree to alter various briefing schedule deadlines, pursuant to Local Civil Rules 7(d)(1) and 10(g), and for the following reasons, Plaintiff Osure Brown (“Plaintiff”) and Defendants Transworld Systems Inc. (“TSI”), Patenaude & Felix, APC (“P&F”), U.S. Bank National Association (“U.S. Bank”), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), hereby stipulate and agree as follows:

1           1.       The Parties stipulate that Plaintiff's deadline to file oppositions to the Defendants'  
2 Motions to Dismiss the Complaint (Dkts. No. 62—73) in the above-referenced action is extended  
3 from September 10, 2020 to September 24, 2020. Likewise the Defendants' deadline to file a  
4 Reply in Support of their Motions to Dismiss is extended from October 1, 2020 to October 15,  
5 2020.

6           2.       The Parties previously stipulated and extended their briefing deadlines related to  
7 the Motions to Dismiss (Dkts. No. 58, 59). However, since that stipulation, Plaintiff's counsel  
8 has undergone an unexpected medical procedure.

9           3.       The parties have entered into this stipulation and agreement to mutually cooperate  
10 in the management of this action. Accordingly, the parties hereby stipulate and agree to extend  
11 the deadlines set forth in the Order dated June 30, 2020 (Dkt. No. 59) as follows:

EVENT	SCHEDULED DATE	RESCHEDULED DATE
Deadline for Plaintiff to file Oppositions to Defendants' Motions to Dismiss	September 10, 2020	September 24, 2020
Deadline for Defendants to file Reply in Support of their Motions to Dismiss	October 1, 2020	October 15, 2020

20           The extension of the above deadlines does not alter or modify any other rights or  
21 responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules  
22 of Civil Procedure, or the Local Civil Rules.

23           DATED: September 8, 2020.

HENRY & DEGRAAFF, P.S.

By: /s/ Christina L. Henry  
Christina L. Henry, WSBA No. 31273  
787 Maynard Ave S  
Seattle, WA 98104  
Telephone: 206.330.0595  
Facsimile: 206.400.7609  
[chenry@HDM-legal.com](mailto:chenry@HDM-legal.com)

*Counsel for Plaintiff*

BORISON FIRM, LLC

By: /s/ Scott Borison  
Scott Borison, *Pro Hac Vice*  
1900 S. Norfolk St., Suite 350  
San Mateo, CA 94403  
[scott@borisofirm.com](mailto:scott@borisofirm.com)

*Counsel for Plaintiff*

CORR CRONIN LLP

By: /s/ Emily J. Harris  
Emily J. Harris, WSBA No. 35763  
Benjamin C. Byers, WSBA No. 52299  
1001 Fourth Avenue, Suite 3900  
Seattle, WA 98154  
[eharris@corrchronin.com](mailto:eharris@corrchronin.com)  
[bbyers@corrchronin.com](mailto:bbyers@corrchronin.com)

*Attorneys for Transworld Systems Inc.*

CONSUMER LAW CENTER, LLC

By: /s/ Phillip Robinson  
Phillip Robinson, *Pro Hac Vice*  
8737 Colesville Road, Suite 308  
Silver Spring, MD 20910  
[phillip@marylandconsumer.com](mailto:phillip@marylandconsumer.com)

*Counsel for Plaintiff*

SESSIONS, FISHMAN, NATHAN & ISRAEL

By: /s/ Bryan C. Shartle, Esq.  
Bryan C. Shartle, *Pro Hac Vice*  
Justin Homes, *Pro Hac Vice*  
Bradley St. Angelo, *Pro Hac Vice*  
3850 North Causeway Boulevard, Suite 200  
Metairie, LA 70002  
[bshartle@sessions.legal](mailto:bshartle@sessions.legal)  
[jhomes@sessions.legal](mailto:jhomes@sessions.legal)  
[bstangelo@sessions.legal](mailto:bstangelo@sessions.legal)

*Attorneys for Transworld Systems Inc.*

JONES DAY

By: Albert J. Rota  
Albert J. Rota, *Pro Hac Vice*  
2727 North Harwood St.  
Dallas, TX 75201  
[ajrota@jonesday.com](mailto:ajrota@jonesday.com)

*Attorneys for U.S. Bank National Association*

PERKINS COIE LLP

LEE SMART, P.S., INC.

By: /s/ Kristine E. Kruger  
Kristine E. Kruger, WSBA No. 44612  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
[KKruger@perkinscoie.com](mailto:KKruger@perkinscoie.com)

By: /s/ Marc Rosenberg  
Marc Rosenberg, WSBA No. 31034  
1800 One Convention Place  
701 Pike St.  
Seattle, WA 98101  
Mr@leesmart.com

*Attorneys for Defendants U.S. Bank National  
Association, National Collegiate Student Loan  
Trust 2004-1, National Collegiate Student  
Loan Trust 2004-2, National Collegiate  
Student Loan Trust 2005-1, National  
Collegiate Student Loan Trust 2005-2,  
National Collegiate Student Loan Trust 2005-  
3, National Collegiate Student Loan Trust  
2006-1, National Collegiate Student Loan  
Trust 2006-2, National Collegiate Student  
Loan Trust 2007-1, National Collegiate  
Student Loan Trust 2007-2*

*Attorneys for Patenaude & Felix, APC*

**ORDER**

IT IS SO ORDERED. The amended deadlines are as follows:

EVENT	SCHEDULED DATE	RESCHEDULED DATE
Deadline for Plaintiff to file Oppositions to Defendants' Motions to Dismiss	September 10, 2020	September 24, 2020
Deadline for Defendants to file Reply in Support of their Motions to Dismiss	October 1, 2020	October 15, 2020

Defendants' motions to dismiss shall be re-noted for the Court's consideration on Friday, October 16, 2020. The extension of the above deadlines does not alter or modify any other rights or responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules of Civil Procedure, or the Local Civil Rules.

DATED this 9<sup>th</sup> day of September, 2020.



Robert S. Lasnik  
United States District Judge

**CERTIFICATE OF SERVICE**

The undersigned certifies as follows:

1. I am counsel for the Plaintiff in this action.
2. On September 8, 2020, I caused a true and accurate copy of the foregoing document to be served on the Honorable Clerk of the Court using the CM/ECF system and all Parties to this action through their attorneys of record.

By: /s/ Christina L. Henry  
Christina L. Henry, WSBA No. 31273